

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JUAN PEREZ,

Plaintiff,

v.

COBB COUNTY and THOMAS
BASTIS, in his individual and
official capacities,

Defendants.

Civil Action No. 1:16-cv-
00902-SCJ

CONSENT MOTION TO EXTEND DISCOVERY

The parties move the Court to extend discovery by 60 days. They have worked diligently to complete discovery, having exchanged written discovery and having taken several depositions. But because discovery has been stayed for Cobb County, it cannot be completed by the scheduled deadline, September 29, 2017. These circumstances did not exist when the parties filed the Joint Preliminary Report and Discovery Plan. Nor could they have anticipated them. The parties thus respectfully request that the Court extend discovery to November 28, 2017. A proposed order is attached.

Dated: September 25, 2017 Respectfully submitted,

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[PROPOSED] ORDER

The parties have moved the Court to extend discovery by 60 days. They have worked diligently to complete discovery. But because discovery has been stayed for Cobb County, it cannot be completed by the scheduled deadline, September 29, 2017. These circumstances did not exist when the parties filed the Joint Preliminary Report and Discovery Plan. Nor could they have anticipated them. The Court thus grants the Motion and extends the discovery period to November 28, 2017.

IT IS SO ORDERED, this __ day of September, 2017.

Honorable Steve C. Jones
United States District Judge

CERTIFICATE OF COMPLIANCE WITH LR 5.1B

I certify that the Consent Motion to Extend Discovery has been prepared in 13-point Century Schoolbook font.

Dated: September 25, 2017 /s/ Andre T. Tennille III
Andre T. Tennille III
Georgia Bar No. 940510

CERTIFICATE OF SERVICE

I certify that today I filed the Consent Motion to Extend Discovery through the Court's CM/ECF system, which will automatically serve all counsel of record.

Dated: September 25, 2017 /s/ Andre T. Tennille III
Andre T. Tennille III
Georgia Bar No. 940510